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Proposed Maximum Residue Limit

PMRL2008-16

Metalaxyl

(publié aussi en français)

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Health Canada's Pest Management Regulatory Agency (PMRA), under the authority of the *Pest Control Products Act* (PCPA), has concluded that the addition of a new use to the label of Apron XL LS, containing technical grade metalaxyl-M, for the control of *Pythium* spp. damping off on leafy greens (Crop Subgroup 4A; see Appendix I), is acceptable. The specific use that was approved in Canada is detailed on the Apron XL LS label (PCPA Registration Number 25585).

The evaluation of this metalaxyl-M application indicated that the end-use product has merit and value and that the human health and environmental risks associated with the new use are acceptable. Details regarding the registration can be found in the corresponding Evaluation Report that is available on the [PMRA website](#), under Public Registry, Product Information, Current Applications.¹

Before registering a pesticide for food use in Canada, the PMRA must determine the quantity of residues that are likely to remain on or in the food when the pesticide is used according to label directions and that such residues will not pose an unacceptable health risk. This quantity is then legally established as a maximum residue limit (MRL). An MRL applies to the identified raw agricultural food commodity as well as to any processed food product that contains it, except where separate MRLs are specified for the raw agricultural commodity and a processed product made from it.

Currently, MRLs are legally established under the Food and Drug Regulations (FDR) after consultation through the *Canada Gazette*. Amendments to the *Food and Drugs Act* (FDA) via [Bill C-28](#), anticipated to come into force in 2008, will allow pesticide MRLs to be legally established under the PCPA without having to adopt MRLs by regulation under the FDA. This will result in a more efficient means of establishing, revising and revoking pesticide MRLs.

Residues of the resolved isomer metalaxyl-M are covered by MRLs established for metalaxyl, the unresolved isomeric mixture. Consultation on the proposed MRLs for metalaxyl is being conducted via this document (see Next Steps). This action is being taken in advance of Bill C-28 coming into force to allow the MRLs to be legally established as soon as possible after the FDA is amended.

¹ The relevant report can be accessed by selecting the Programs and Special Actions/Minor Use/Historical tab and opening the Evaluation Report found under Application Number 2007-2498.

The proposed MRLs for metalaxyl in Canada in or on food, to be added to those currently established and to complete the leafy greens (Crop Subgroup 4A) are as follows.

Table 1 Proposed Maximum Residue Limits for Metalaxyl

Common Chemical Name	Chemical Name of Substance	MRL (ppm)	Food Commodities*
Metalaxyl	<i>N</i> -(2,6-dimethylphenyl)- <i>N</i> -(methoxycetyl)-DL-alanine methyl ester, including metabolites that can be converted to the 2,6-dimethylaniline moiety, each expressed as metalaxyl equivalents ²	5	Amaranth, arugula, corn salad, dandelion leaves, dock, edible leaved chrysanthemum, endives, fresh chervil leaves, fresh parsley leaves, garden cress, garden purslane, garland chrysanthemum, head lettuce**, leaf lettuce**, orach leaves, radicchio, upland cress, winter purslane

* The listed commodities from Crop Subgroup 4A do not include New Zealand spinach, spinach and vine spinach because they are covered by an established MRL of 10 ppm for "spinach".

** The established MRL of 5.0 ppm for "lettuce" is to be replaced by separate entries for "head lettuce" and "leaf lettuce".

A complete list of all MRLs established in Canada can be found in [Table II, Division 15](#) of the FDR. Once the amendments to the FDA via Bill C-28 are in force, the list of legally established Canadian MRLs will be available on the PMRA's [MRL webpage](#) which will be updated to include the MRLs listed in this document in addition to the revised residue definition.

International Situation and Trade Implications

MRLs may vary from one country to another for a number of reasons, including differences in pesticide use patterns and the locations of the field crop trials used to generate residue chemistry data. As per Table 2, the proposed MRL in Canada is the same as the corresponding tolerance for the leafy vegetable, except *Brassica*, crop group established in the United States (listed in [40 CFR Part 180](#) by pesticide), but differs from the Codex MRL³ established for head lettuce ([Codex MRLs](#) searchable by pesticide or commodity).

² The residue definition for metalaxyl is currently captured in Table II, Division 15 of the FDR as the parent chemical "including metabolites containing the 2,6-dimethylaniline moiety". The reference to the metabolites is to be revised to "including metabolites that can be converted to the 2,6-dimethylaniline moiety, each expressed as metalaxyl equivalents" in accordance with Table 1 above to more accurately reflect the metabolism of the parent chemical and the common moiety analytical methodology used to determine metalaxyl residues.

³ Codex is an international organization under the auspices of the United Nations that develops international food standards, including MRLs.

Table 2 Comparison of Canadian MRL, American Tolerance and Codex MRL

Food Commodities	Canadian MRL (ppm)	American Tolerance (ppm)	Codex MRL (ppm)
Amaranth, arugula, corn salad, dandelion leaves, dock, edible leaved chrysanthemum, endives, fresh chervil leaves, fresh parsley leaves, garden cress, garden purslane, garland chrysanthemum, head lettuce, leaf lettuce, orach leaves, radicchio, upland cress, winter purslane	5	5.0*	2.0 ("Lettuce, Head" only)

* Covered by the tolerance established for "Vegetable, leafy, except brassica, group 4, except spinach".

Next Steps

The PMRA invites the public to submit written comments on the proposed MRLs for metalaxyl up to 75 days from the date of publication of this document. Please forward your comments to Publications (see contact information on the cover page of this document). The PMRA will consider all comments received before making a final decision on the proposed MRLs for metalaxyl and posting an Established Maximum Residue Limit (EMRL) document on the PMRA's website once the amendments to the FDA are in force.

Appendix I Crop Groups: Numbers and Definitions

Crop Subgroup Number	Name of the Crop Subgroup	Food Commodities Included in the Crop Subgroup
4A	Leafy vegetables except <i>Brassica</i> , Leafy greens	Amaranth Arugula Corn salad Dandelion leaves Dock Edible leaved chrysanthemum Endives Fresh chervil leaves Fresh parsley leaves Garden cress Garden purslane Garland chrysanthemum Head lettuce Leaf lettuce New Zealand spinach Orach leaves Radicchio Spinach Upland cress Vine spinach Winter purslane

